

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 97 of the Commission's)	
Amateur Radio Service Rules to Eliminate)	RM - 10786
Morse Code Proficiency Testing)	
Requirements)	
For All Classes of Amateur Licenses)	
To: The Commission)	

Comments Of Eric R. Ward—N0HHS

I support the arguments of petitioner and recommend immediate adoption of the changes to Part 97 requested in the above-captioned petition.

The Commission stated in its most recent review of Part 97 rules (WT Docket No. 98-143) that the public interest was served by reducing the Morse code proficiency requirement to the minimum required by the ITU *Radio Regulations*. At the recent World Radiocommunications Conference, those *Regulations* were amended to remove any requirement for Morse code proficiency. Thus, the “minimum requirement that meets the ITU *Radio Regulations*” is now *NO* testing for proficiency in Morse code.

Administrations of many other nations--Switzerland, the United Kingdom, Belgium, Germany, The Netherlands, and Norway--have already acted in an expedited fashion to eliminate Morse code testing requirements, and many more have indicated that they intend to act rapidly to do the same. The Commission does not serve the public interest by imposing a burdensome

requirement on the US population beyond the requirement imposed on equally qualified individuals in other countries.

Clearly, the Commission has the authority to amend its Part 97 rules to eliminate Morse proficiency requirements without further formal notice and public input. This same issue has previously been subjected to extensive public comment in 1998. The Commission carefully considered that input as part of WT Docket No. 98-143, and negated any argument for using Morse code proficiency as a “gate-keeper” to exclude parties not motivated to learn Morse code from the high frequency bands of the amateur service. Moreover, the only substantive change from the consideration given by the Commission in 1998 is the removal of the Morse code requirement from the ITU *Radio Regulations*, and that requirement was the *only* stated reason for maintaining any Morse proficiency testing at that time. Thus, it is eminently logical, and represents the best use of scarce Commission resources, to simply expedite the removal of Morse code proficiency testing as requested in the above-captioned petition.

The Commission has and will be asked to consider numerous other changes to the rules controlling the amateur service, including allocation of sub-bands for various modes of communication, changing of written examination requirements, changes in the number of license classes, etc. The Commission should not group consideration of any of these changes with the change requested herein. Elimination of the Morse code testing requirement is a self-contained issue. Expedited action by the Commission is clearly within its authority and best serves the public interest.

Respectfully submitted,

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